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May 10, 2001

Mr. Michael McAteer  
U. S. EPA - Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)**  
• **May 2001 Monthly Report**

Dear Mr. McAteer,

Enclosed is the May 2001 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

**cc:** K. Turner - USEPA  
T. Gouger - USACE  
C. Morin - IEPA  
Sauget File - Solutia  
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)  
Kevin de la Bruere - USF&W  
Michael L. Henry - IDNR  
Tom Long - Cahokia Consultant (% Sapphire Group)  
Dave Webb - IDPH  
Mayor Dee Reed - Cahokia, IL  
Mayor P. Sauget - Sauget, IL

## **Sauget Sites Area I - Sauget, Illinois**

### **AOC - EECA / RIFS**

#### **Monthly Report**

**Date of Report:** May 10, 2001  
**Period Covered:** April 1, 2001 - April 31, 2000  
**Next Report Period:** May 1, 2001 - May 30, 2001

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#### **Work Performed during the reporting period**

The Sauget Area I consolidated draft EE/CA & RI/FS Report was submitted to the Agencies for review and comment on March 9, 2001. The Agencies responded to Solutia with comments on April 12, 2001. Solutia met with the Agencies at the Sauget Village Hall on April 18, 2001 to discuss the Agencies' comments - for clarification and understanding. As a result of the discussions and in consideration of the revisions required before the document is approvable by the Agencies, agreement was reached that a revised draft EE/CA & RI/FS Report will be submitted to the Agencies by May 31, 2001.

The Agencies continued to review Solutia's March 30, 2001 Response to their February 16, 2001 Comments on the January 9, 2001 submittal of the draft Human Health and Ecological Risk Assessments

There are no Technical Memos attached to this report.

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#### **Data Submittal**

There is no data submitted in this report.

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#### **Work scheduled for next reporting period**

Solutia will meet with the Agencies on May 23, 2001 to discuss planned revisions to the March 9, 2001 draft EE/CA & RI/FS Report. The revised Report will be submitted to the Agencies by May 31, 2001.

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#### **Problems and Solutions**

NONE

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**Submittal Schedule Status**

See attached schedule - consistent with the approved SSP - as revised where indicated.

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**Other Issues****May 31, 2000 UAO (Sediments Removal)****Background**

A related UAO was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan ("TCRAWP") was submitted to the Agencies June 30, 2000 for review and approval. Agreement on the major aspects of the TCRAWP was achieved in November. Additional agreements were reached in December - sufficient to proceed with issuance of a request for bids for the containment cell construction. Bids were received in late January and were evaluated in February.

Fieldwork began on the sediment de-watering phase of the project in November 2000 and continued throughout the Report Period. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments over the next several months - while the containment cell is being constructed - was completed and started up in February.

Subject to the inclusion of all comments and agreed upon revisions, approval of the containment cell design by U. S. EPA was received March 5, 2001. A contract for construction of the containment cell was awarded March 8, 2001. A revised draft containment cell design was submitted to the Agencies March 30, 2001. This revised draft containment cell design incorporated all Agencies' comments and changes agreed to during the preceding discussion period. Final approval of the containment cell design and the TCRAWP awaits a final review by the Agencies to validate that all agreed-to changes and additions were added to the revised containment cell design.

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### **Work Performed during the reporting period**

Placement of fill for the Containment Cell berms began April 23, 2001. Clearing from Dead Creek all debris and brush that would impede the removal of the sediments continued in April. This activity is expected to continue through May.

The March 30, 2001 revised draft containment cell design continued under review by the Agencies. An April 20, 2001 discussion conference call resulted in clarification and resolution of several issues. Final approval of the containment cell design and the TCRAWP awaits the completion of the final review by the Agencies to validate that all agreed-to changes and additions were added to the revised containment cell design.

A Groundwater Monitoring Plan for the Containment Cell area submitted to the Agencies for review and comment on March 19, 2001 continued under review.

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#### **Comments:**

NONE

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**January 21, 1999 Sauget Area I AOC**  
**SCHEDULE**

**(03/01 Revision)**

- |  |   |
|--|---|
| 1. Designation of Contractor                         | Completed 3/10/99 <sup>1</sup>  |
| 2. Designation of Other Contractors                  | 5 Business Days Before Start of Work  |
| 3. Designation of Project Coordinator                | Completed   |
| 4. Submit Support Sampling Plan (SSP)                | <b>Submitted February 22, 1999</b>  |
| 5. Submit Revised SSP                                | April 8, 1999 <sup>2</sup><br>June 25, 1999 <sup>3</sup><br>August 13, 1999 <sup>4</sup><br><b>October 9, 1999<sup>5</sup> Approval</b> |
| 6. Obtain Access Agreements                          | July 1, 1999 <sup>6</sup><br>October 17, 1999 <sup>7</sup><br>October 1, 1999 <sup>8</sup>  |
| 7. Submit Health and Safety Plan (HASP)              | Approved October 9, 1999  |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved October 9, 1999  |

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<sup>1</sup> Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

<sup>2</sup> Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

<sup>3</sup> April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25<sup>th</sup> as required.

<sup>4</sup> June 25<sup>th</sup> SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

<sup>5</sup> August 13, 1999 SSP submittal as revised August 30, 1999 and October 7, 1999 received final Agency approval on October 9, 1999.

<sup>6</sup> Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

<sup>7</sup> Access agreements update issued August 15, 1999 with request to extend deadline to October 17, 1999. Extensions to October 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

<sup>8</sup> Access agreements update issued October 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a October 21, 1999 e-mail to Mike Light

**January 21, 1999 Sauget Area I AOC**

**SCHEDULE (Cont.)**

**(03/01)**

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|---------------------------------------|--|
| 9. Sampling Notification              | 10 Business Days Prior to Start of Work <sup>9</sup>   |
| 10. Submit Data Report <sup>10</sup>  | <b>01/09/01<sup>11</sup> (Submitted 1/9/01-)<br/>Included HH &amp; Eco R/As)</b>                     |
| 11. Submit EE/CA Report <sup>12</sup> | 60 Calendar Days After Data Report Submittal - <b>03/09/01<br/>(Submitted 3/9/01)</b>                |
| • Revised HH and ECO R/As             | <b>March 30, 2001<sup>13</sup> (Submitted 3/30)</b>  |
| 12. Submit Revised EE/CA Report       | 21 Calendar Days After Receipt of EPA Comments   |
| 13. Submit RI/FS Report               | 90 Calendar Days After Data Report Submittal - <b>04/09/01<br/>(Submitted 3/9/01 w/ EECA Report)</b> |
| 14. Submit Revised RI/FS Report       | 21 Calendar Days After Receipt of EPA Comments <b>(Submitted March 30, 2001)</b>                     |
| 15. Progress Reports                  | Monthly Beginning February 19, 1999 <sup>14</sup>  |

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<sup>9</sup> Notification given on August 19, 1999 that Air Sampling will begin on October 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

<sup>10</sup> The January 9, 2001 Data Report submittal also included the draft Human Health and ECO Risk Assessments.

<sup>11</sup> Per SSP - 16 mo. from SSP approval date of 9/9/99.

<sup>12</sup> The March 9 EECA submittal also included the RIFS.

<sup>13</sup> The Agencies formally commented on the January 9, 2001 Draft Human Health and Ecological Risk Assessments and discussed them in a February 21 meeting and required submittal of revised Risk Assessments March 30, 2001.

<sup>14</sup> Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10<sup>th</sup> of the month.